

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b)	
Jenkins & Clayman Eric J Clayman 412 White Horse Pike Audubon, NJ 08106 (856) 546-9696 Attorney for Debtor	
In Re:	
Phillip and Maria Barbour	
debtors	

Case No.: 18-31275

Judge: CMG

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☒ Motion for Relief from the Automatic Stay filed by Nationstar Mortgage, LLC
d/b/a Mr. Cooper, creditor.

A hearing has been scheduled for August 7, 2019, at 9:00 a.m..

- ☐ Motion to Dismiss filed by the Standing Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

- ☐ Certification of Default filed by _____.

I am requesting a hearing be scheduled in this matter.

2. I am objecting to the above for the following reasons (**choose one**):

- ☐ Payments have been made in the amount of \$_____, but have not
been accounted for. Documentation in support of attached hereto.

☒ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

We were attempting to save both this property and an additional non-residential property and realize it is unaffordable. We will modify our plan to sell or surrender this other property which will reduce our Trustee payment and make our plan more affordable. We will catch up by paying a triple payment, \$4,500.00, by the court date and then pay an extra payment (double payment) to begin September for 6 months.

☐ Other (**explain your answer**):

3. I certify under penalty of perjury that the above is true.

Date: July 22, 2019

/s/ Maria Barbour
Debtor's Signature

Date: _____

Debtor's Signature

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.